

## **Standard Operating Procedure**

# **Review and Reduce Personally Identifiable Information (PII) and Eliminate the Unnecessary Use of SSN Annual Reporting Procedures**

**ITS-SOP-0046A**

**Effective Date: 20090227**

**Expiration Date: 20110227**

**Responsible Office: Office of the Chief Information Officer**

## **Revision Record**

Revision Number	Date	Change Description
V.1.0	Dec 17, 2007	Initial
V.1.1	Jan 09, 2008	Administrative Corrections
V.2.0	Feb 10, 2009	Revised for FY09

# Review and Reduce Personally Identifiable Information (PII)

## 1.0 Introduction

In accordance with the Office of Management and Budget (OMB) Memorandum M-07-16, *Safeguarding against and Responding to the Breach of Personally Identifiable Information (PII)*, NASA is required to conduct an annual review of its PII holdings for accuracy, and reduce the amount of necessary PII to a minimum to perform the agency's function. We must also specifically review the use of social security numbers (SSNs) within systems and programs to identify instances where the collection or usage is not necessary and can be eliminated.

## 1.1 Purpose

The purpose of this standard operating procedure (SOP) is to provide steps for implementing the NASA Plan for Reviewing and Reducing PII, assuring that NASA retains only the minimum PII holdings required for operations and administration.

This SOP:

- Implements a procedure for eliminating the unnecessary use of PII
- Includes an explanation of roles and responsibilities.
- Presents the process for conducting an annual review of NASA PII holdings and progress toward reducing and eliminating unnecessary instances of PII.

As defined in NASA Procedural Requirements (NPR) 1382.1, PII is any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical, criminal or employment history and information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including information in identifiable form (IIF), personal health information (PHI), or any other personal information which is linked or linkable to an individual. For purposes of this procedure, PII is information, which when used either alone or combined with other information, can be used to trace and identify a specific person.

## 1.2 Scope

This SOP applies to the NASA Privacy Program Manager, the Center Privacy Managers and all NASA PII holders (this includes PII holdings in the form of paper, electronic or any other media format).

NASA conducted a survey in Fiscal Year (FY) 2006 that established a baseline inventory of systems and applications containing PII. This procedure was based off the Master Personally Identifiable Information List (MPIIL) which was updated by the Center Privacy Managers in 2008.

During FY 2007, NASA refined and revalidated the inventory, identified opportunities and formulated plans for reducing those holdings.

Beginning with the second quarter of each fiscal year NASA will conduct an annual review of all of its PII holdings in any form. As part of the annual review, NASA will validate or revalidate the need for its PII holdings.

### **1.3 Applicable Documents**

- OMB M-06-16, *Protection of Sensitive Agency Information*
- OMB M-07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*
- OMB M-07-19, *FY 2007 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Policy*
- NASA NPD 1382.17G, *NASA Privacy Policy*
- NASA NPR 1382.1, *NASA Privacy Procedural Requirements*
- NASA NPR 1600.1, *NASA Security Program Procedural Requirements*
- NASA ITS 1382.1, *NASA Plan for Reviewing and Reducing Personally Identifiable Information and Eliminating Unnecessary Use of Social Security Numbers (SSNs)*

### **1.4 Roles and Responsibilities**

The roles and responsibilities during the annual review and reduction of PII holdings are as follows.

#### **1.4.1 The NASA Senior Agency Official for Privacy (SAOP) shall:**

- Approve the annual NASA Plan for Reviewing and Reducing Personally Identifiable Information and Elimination of Unnecessary Use of Social Security Numbers (SSNs).
- Approve the annual NASA Report on Reviewing and Reducing PII and Eliminating Unnecessary Use of SSNs.

#### **1.4.2 The NASA Privacy Program Manager shall:**

- Establish the specific PII Review and Reduction reporting requirements and communicating them out to the Center Privacy Manager community.
- Consolidate all of the Center PII Review and Reduction reports and draft the annual NASA Report on Reviewing and Reducing PII and Eliminating Unnecessary Use of SSNs for inclusion in the annual Federal Information Security Management Act (FISMA) report as required.
- Provide follow-up actions to the appropriate Center Privacy Managers to ensure actions are completed for those areas where PII holdings can be reduced as indicated in the PII review and reduction report.
- Develop employee notices regarding the use of SSN and eliminating the unnecessary use in electronic and non-electronic form.

#### **1.4.3 The Center Privacy Manager shall:**

- Send tasking to their PII holders to review, revalidate, and report reduction progress for their current PII holdings, justifying any new holdings.

- Consolidate the reports from the PII holders
- Analyze the consolidated reports of PII holdings to find redundancies or questionable holdings, and methods of reducing them.
- Submit a report to the NASA Privacy Program Manager as required each fiscal year using Appendix A.
- Coordinate with the Center Forms Manager the review of new and existing Center forms that use SSN.

#### 1.4.4 PII Holders shall

- Review and validate all PII holdings during the second quarter of each fiscal year, as directed by their Center Privacy Manager.
- Submit a report to the Center Privacy Manager with justification for any previously reported or new PII holdings, using Appendix B.

### **1.5 Process for Reviewing and Reducing PII Holdings**

#### 1.5.1 Second Quarter of each Fiscal year:

- The Center Privacy Managers will receive a Privacy Action item request from the NASA Privacy Program Manager (which is communicated and tracked through the Chief Information Officer (CIO) Action Tracking Registry) directing them to start the annual PII Review and Reduction exercise.
- The Center Privacy Manager will communicate and assign PII holders the task of reviewing, revalidating, and reducing their current PII holdings and justifying any new holdings.
- The Center Privacy Manager will provide the PII holder with the Privacy Action request, a soft copy of both the ITS SOP 0046 guide and the MPIIL reporting template spreadsheet that is to be used by the PII holder.
- The PII holders will review all PII holdings (electronic and physical) to find ways of reducing them and to justify those that remain.
- The PII holders will use the MPIIL reporting template spreadsheet to document their review findings.
- The report will contain proposals for reducing their PII holdings as well as justifications for PII holdings that remain, whether they are new or were previously reported.
- The Center Privacy Manager will work with PII holders to ensure the timeliness and completion of the following SSN reduction exercises from the previous year's PII Review and Reduction Report:
  - Verify whether those PII holdings that were candidates for consolidation were consolidated.
  - Verify whether those PII holdings that were slated to be eliminated during the previous year actually were eliminated.
  - Verify whether those PII holdings that are slated to be eliminated over the next two years are still on schedule for elimination.

- Verify whether those PII holdings that were slated to be replaced during the previous year were actually replaced.
- The Center Privacy Manager will develop a plan to work with their Center Forms Manager to conduct a review of all existing Center forms that use SSN (to be completed by second quarter of the following FY). The plan will include the following:
  - Timeline for conducting review of all existing forms with the Center Forms Manager to identify those forms that use SSN.
  - Timeline for reviewing forms that use SSN with form owner to identify those forms where SSN can be truncated or masked or replaced by Universal Uniform Personal Identification Code (UUPIC).
  - For those forms where the owner indicates SSN is no longer needed, ensure the owner communicates to Center personnel to no longer use SSN on the form until the form can be revised.
  - Identify process and timeline to revise those forms where SSN can be truncated, masked, or replaced.
  - Document justification for continued use of SSN on forms still requiring the use of SSN on the MPIIL.
  - Timeline for implementing a process with the Forms Manager to review all new forms in development to ensure SSN is not used or there is justification for the use of SSN on the form.

#### 1.5.2 Third Quarter of Each Fiscal Year:

- The Center Privacy Manager will consolidate and analyze the reports of PII holdings from the holders to find redundancies or questionable holdings, and identify methods of reducing them.
- The Center Privacy Manager will submit a comprehensive Center PII Review and Reduction report to the NASA Privacy Program Manager using the format in Appendix A. This comprehensive report will contain a consolidated report of the Center's PII holdings (MPIIL), a summary of the analysis, justification for PII holdings, and a plan to review and reduce the use of SSN on Center Forms.

#### 1.5.3 Fourth Quarter of Each Fiscal Year:

- The Privacy Program Manager will consolidate and analyze the Center PII Review and Reduction reports submitted by the Center Privacy Managers.
- The Privacy Program Manager will compile and draft NASA's Report on Reviewing and Reducing PII and Eliminating Unnecessary use of SSNs and provide updates to the NASA SAOP for approval and inclusion in the annual FISMA report.
- The SAOP will review for approval the NASA Report on Reviewing and Reducing PII and Eliminating Unnecessary use of SSNs and ensure it is made publicly available.

### 1.6 Content of the Master PII Holdings Report

1.6.1 Information to be reported on the MPIIL includes (see Appendix B):

- NASA Center – What is the center location of the system
- System Name – Name of system, application, or form
- System Function – What is the function of the system, application or form
- System Security Plan Number – What is the system security plan number
- System Security Category (L,M,H) – What is systems categorization level
- System Owner – Who is the Agency Official responsible for the system
- Is this a Privacy Act (PA) System (Y/N) – Does this system qualify as a PA system
- What is the published System of Record (SOR) Name – What is the name of the SOR Notice
- System of Record (SOR) System Manager –Who is the point of contact for the SOR
- What types of records are in the system- What types of PII data elements are in the system
- Does this system collect information on the public (Y/N) – Does the system store personal information from the public
- How are the records physically stored – Are the records stored in electronic, paper or on microfilm
- Has an OMB security checklist been completed - Provides specific actions to be taken by moderate or high systems that are either accessed remotely; or physically transported outside of the agency's secured, physical perimeter
- Is this system maintained or operated by a contractor (Y/N) – Is the system maintained or operated by a non-civil servant
- What is the contract number which covers this system – What is the contract number assigned by the Contracting Office
- Is the Privacy Act FAR Clause included in the contract (Y/N) – Does the contract contain the specific language binding contractors
- Are the system of records being disposed of per the PA SOR notice in accordance with NASA Records Retention Schedules (NRRS) (Y/N) – Are the SOR being disposed of properly
- Are the system of records being disclosed of per the PA SOR notice (Y/N) – Are the SOR being disclosed of properly
- Does the system collect or maintain social security numbers (SSN) (Y/N) – Does the system capture or retain SSNs
- Is this system a candidate for consolidation (Y/N) – Can the PII holdings in this system be combined with another system
- Is this system scheduled to be replaced in FY09 (Y/N) – Will this system be replaced during the current fiscal year

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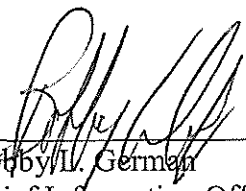
ITS-SOP-0046A -- Review and Reduce PII and Eliminate Unnecessary use of SSN Reporting

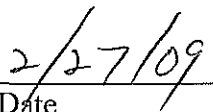
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- Is this system scheduled to be decommissioned or eliminated in FY09 (Y/N) – Will this system be decommissioned or eliminated during the current fiscal year
- Is this system scheduled to be decommissioned or eliminated in FY10 or FY11 (Y/N) – Will this system be decommissioned or eliminated during the next fiscal year
- Remarks - For noting special considerations, schedule for reductions, or any other information that is pertinent



## 2.0 Approval

  
\_\_\_\_\_  
Bobby L. German  
Chief Information Officer (Acting)

  
\_\_\_\_\_  
Date

## Appendix A

# **[Center] Privacy Act Manager's Annual Review and Reduction of Holdings of Personally Identifiable Information as Required in OMB Memorandum M-07-16**

### **Introduction [Example wording for introductory paragraph]**

In accordance with ITS-SOP-0046, Review and Reducing Personally Identifiable Information (PII) and ITS-Plan 1382-1, NASA Plan For Reviewing and Reducing Personally Identifiable information (PII) and Eliminating Unnecessary Use of Social Security Numbers (SSNs), a review was conducted in 2<sup>nd</sup> quarter FY09 of electronic applications containing PII as reported by the holders to find redundancies or questionable holdings, and methods of reducing them. Possible methods of reduction included elimination, consolidation or setting time limits on retention periods.

### **Review and Reduction Analysis [Analysis of review]**

*Using the data reported on the Master PII List (MPIIL), provide a narrative summary on the review of those applications containing PII and their status such as those decommissioned as a result of being consolidated into an agency-wide solution, those that can replace SSN with UUPIC or a government-wide alternate identifier, or if retaining PII is justifiable, what controls are in place (or are planned to be put in place) to protect the information (such as suppressing visibility of SSN on screens or in reports, encryption, etc.). See the discussion of the figures in ITS-PLAN 1382-1 for examples of how to write narrative summaries of data that are presented in a table.*

The results of this review are summarized in the following table:

Number of Applications Reported Containing PII	Number of Applications Where Retaining PII Justified	Number of Applications that were candidates for decommission in FY09		Number of Applications that were candidates for consolidation in FY09		Number of Applications that are candidates for decommissioning or consolidation in FY10
		Number of Candidates	Actual Number decom	Number of Candidates	Actual Number decom	

**Plan for Review of Center Forms using SSN [Detailed plan of how this is going to be accomplished in FY09]**

*Giving specific dates, provide a timeline to contact the Center Forms Manager, develop a list of all forms currently using SSN, review all existing forms currently using SSN with the owner, if SSN can be eliminated from the form, the process and timeline for removing SSN from the form, and implement a process for reviewing all new forms that will require the use of SSN. The following format for timeline may be used:*

<i>Action</i>	<i>Start</i>	<i>Finish</i>
<i>Contact Center Forms Manager</i>		
<i>Review all existing Forms for use of SSN</i>		
<i>Update MPIIL with all Forms that use SSN</i>		
<i>Contact Owners of Forms to set up meeting to discuss use of SSN and possible elimination</i>		
<i>Document on MPIIL the continued use of SSN on forms still requiring it.</i>		
<i>Ensure communication is provided to Center personnel on eliminating the use of SSN on forms no longer requiring SSN</i>		

<i>Identify process for eliminating SSN on form if no longer required</i>		
<i>Identify timeline to eliminate SSN on those forms no longer requiring SSN.</i>		
<i>Implement process with the Forms Manager to review all new forms in development to ensure SSN is not used or there is justification for the use of SSN on the form.</i>		

*For FY10, the following information will be requested as a result of reviewing forms for use of SSN according to the plan identified above:*

Number of Forms Using SSN	Number of Forms where Continued use of SSN on Form is Justified	Number of Forms where SSN can be eliminated	Number of Forms that are candidates for removal of SSN in the next two years		Number of Forms that are candidates for decommissioning	
			FY10	FY11	FY10	FY11

## Appendix B

## Report on Personally Identifiable Information (PII)

Master Personally Identifiable Information List (MPIIL)

System Information						Privacy Act Information														OMB Information					Remarks	
NASA Center	System Function	System Name	System Security Plan Number	System Security Category (L=Low, M=Medium, H=High)	System Owner (Name and Title of Agency Official Responsible for the System)	Is This a Privacy Act (PA) System? (Y/N)	What Is The Published System of Record (SOR) Number?	What Is The Published System of Record (SOR) Name?	System of Record (SOR) System Manager	What Type of Records Are in This System?	Does This System Collect Information on The Public? (Y/N)	How Are The Records Physically Stored? (Electronically, Paper or Microfilm)	Has An OMB Security Checklist Been Completed For This System? (Y/N)	Is This System Maintained or Operated by a Contractor (Y/N)	What Is The Contract Number Which Covers This System?	Is The Privacy Act FAR Clause Included in The Contract (Y/N)	Are The System of Records Being Managed as Records? (Y/N)	Are The System of Records Being Disposed of Per The PA SORN in Accordance With NASA Records Retention Schedules (NRRS)? (Y/N)	Are The System of Records Being Disclosed of Per The PA SORN?	Does This System Collect or Maintain Social Security Numbers (SSNs)? (Y/N)	Is This System a Candidate For Consolidation? (Y/N)	Is This System Scheduled To Be Replaced in FY09? (Y/N)	Is This System Scheduled To Be Decommissioned or Eliminated in FY09? (Y/N)	Is This System Scheduled To Be Decommissioned or Eliminated in FY10 or		